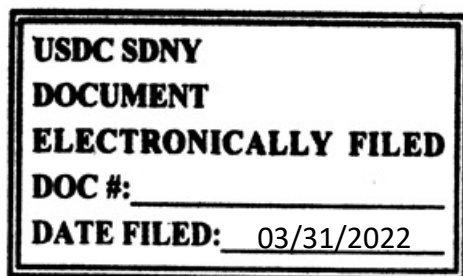


quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.
(212) 849-7345

WRITER'S EMAIL ADDRESS
danbrockett@quinnemanuel.com



March 15, 2022

VIA ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

Allianz Global Investors GmbH, et al. v. Bank of America Corporation, et al., 1:18-cv-10364

Dear Judge Schofield:

Pursuant to Rules I.B.1 and I.D of Your Honor's Individual Rules and Procedures for Civil Cases, we respectfully seek leave to file under seal certain supporting papers and exhibits to Plaintiffs' Motion for Issuance of a Hague Convention Request for International Judicial Assistance to Take Testimony Overseas. Pursuant to Rule I.D.3, this motion and supporting papers have been publicly filed with the redactions, and unredacted versions have been electronically filed under seal and linked to this application.

This request asks the Court to seal the Third Amended Complaint (already filed under seal), documents that reference numerous chat transcripts that Defendants produced and designated as confidential, copies of the chat transcripts, and personal information about the proposed deponent including his home address. Given Defendants designated these materials as "confidential," supporting papers include documents already filed under seal, and sensitive personal information of the deponent is contained within these papers, Plaintiffs respectfully request that the Court grant Plaintiffs permission to file the requested documents in redacted form on ECF and in unredacted form under seal.

quinn emanuel urquhart & sullivan, llp

ATLANTA | AUSTIN | BOSTON | BRUSSELS | CHICAGO | DOHA | HAMBURG | HONG KONG | HOUSTON | LONDON | LOS ANGELES | MANNHEIM | MIAMI | MUNICH | NEUILLY-LA DEFENSE | NEW YORK | PARIS | PERTH | RIYADH | SALT LAKE CITY | SAN FRANCISCO | SEATTLE | SHANGHAI | SILICON VALLEY | STUTTGART | SYDNEY | TOKYO | WASHINGTON, DC | ZURICH

Respectfully submitted,

/s/ Daniel L. Brockett

Daniel L. Brockett
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
Fax: (212) 849-7100
danbrockett@quinnemanuel.com

Jeremy D. Andersen (pro hac vice)
Anthony Alden (pro hac vice)
Johanna Ong (pro hac vice)
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
Fax: (213) 443-3100
anthonyalden@quinnemanuel.com
jeremyandersen@quinnemanuel.com
johannaong@quinnemanuel.com

Counsel for Plaintiffs

Request GRANTED. The proposed redactions and sealing requests are narrowly tailored to prevent unauthorized dissemination of sensitive business information. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 11920 (2d Cir. 2006). SO ORDERED.

Dated: March 31, 2022



APPENDIX

PARTY	COUNSEL OF RECORD
Plaintiffs	
Allianz, et al. (Plaintiffs)	<p>Daniel L. Brockett Quinn Emanuel Urquhart & Sullivan, LLP 51 Madison Avenue, 22nd Floor New York, New York 10010 Telephone: (212) 849-7000 Fax: (212) 849-7100 danbrockett@quinnemanuel.com</p> <p>Anthony Alden (pro hac vice) Jeremy D. Andersen (pro hac vice) Chris R. Barker (pro hac vice) 865 South Figueroa Street, 10th Floor Los Angeles, California 90017 Telephone: (213) 443-3000 Fax: (213) 443-3100 anthonyalden@quinnemanuel.com jeremyandersen@quinnemanuel.com chrisbarker@quinnemanuel.com</p>
Defendants	
Bank of America Corporation Bank of America, N.A. Merrill Lynch, Pierce, Fenner & Smith Inc.	<p>Adam Selim Hakki Shearman & Sterling LLP (NY) 599 Lexington Avenue New York, NY 10022 (212)-848-4924 Fax: (646)-848-4924 Email: ahakki@shearman.com</p> <p>Jeffrey Jason Resetarits Shearman & Sterling LLP (NY) Email: jeffrey.resetarits@shearman.com</p> <p>Richard Franklin Schwed Email: rschwed@shearman.com</p>
Barclays Bank PLC Barclays PLC Barclays Capital, Inc.	<p>Jacob Bailey Lieberman Sullivan & Cromwell, LLP (NYC) 125 Broad Street New York, NY 10004 (212)-558-3193 Fax: (212)-291-9489 Email: liebermanj@sullcrom.com</p>

PARTY	COUNSEL OF RECORD
	<p>Matthew Alain Peller Sullivan & Cromwell, LLP (NYC) Email: pellerma@sullcrom.com</p> <p>Matthew Alexander Schwartz Sullivan & Cromwell, LLP (NYC) Email: schwartzmatthew@sullcrom.com</p> <p>Mavara Agha Sullivan & Cromwell, LLP (NYC) Email: agham@sullcrom.com</p>
<p>BNP Paribas Group BNP Paribas USA, Inc. BNP Paribas S.A. BNP Paribas Securities Corp.</p>	<p>Alejandro Hari Cruz Patterson, Belknap, Webb & Tyler LLP 1133 Avenue of the Americas New York, NY 10036 212-336-2000 Fax: 212-336-2222 Email: acruz@pbwt.com</p> <p>Camille Latoya Fletcher Patterson, Belknap, Webb & Tyler LLP Email: cfletcher@pbwt.com</p> <p>David C. Esseks Allen & Overy, LLP 1221 Avenue of the Americas New York, NY 10020 (212) 610-6300 x344-6694 Fax: (212) 610-6399 Email: david.esseks@allenoverly.com</p> <p>Joshua Aaron Goldberg Patterson, Belknap, Webb & Tyler LLP Email: jgoldberg@pbwt.com</p> <p>Laura Rose Hall Allen & Overy, LLP Email: laura.hall@allenoverly.com</p> <p>Rebecca Rose Delfiner Allen & Overy, LLP Email: rebecca.delfiner@allenoverly.com</p>
<p>Citigroup, Inc. Citibank, N.A. Citigroup Global Markets, Inc.</p>	<p>Andrew Arthur Ruffino Covington & Burling LLP (NYC) 620 Eighth Avenue</p>

PARTY	COUNSEL OF RECORD
	<p>New York, NY 10018-1405 212-841-1000 Fax: 212-841-1010 Email: aruffino@cov.com</p> <p>Andrew D. Lazerow Covington & Burling, LLP (DC) Email: alazerow@cov.com</p> <p>Robert D. Wick Covington & Burling, LLP (DC) Email: rwick@cov.com</p>
<p>Credit Suisse AG Credit Suisse Securities (USA) LLC</p>	<p>David George Januszewski Cahill Gordon & Reindel LLP 80 Pine Street New York, NY 10005 212-701-3000 Fax: 212-269-5420 Email: djanuszewski@cahill.com</p> <p>Elai E. Katz Cahill Gordon & Reindel LLP Email: ekatz@cahill.com</p> <p>Herbert Scott Washer Cahill Gordon & Reindel LLP Email: hwascher@cahill.com</p> <p>Jason Michael Hall Cahill Gordon & Reindel LLP Email: jhall@cahill.com</p> <p>Miles Wiley Cahill Gordon & Reindel Email: mwiley@cahill.com</p> <p>Sheila Chithran Ramesh Cahill Gordon & Reindel LLP Email: sramesh@cahill.com</p>
<p>Deutsche Bank AG Deutsche Bank Securities Inc.</p>	<p>George Patrick Montgomery King & Spalding LLP (DC) 1700 Pennsylvania Avenue, N.W. Washington, DC 20006-4706 202-737-0500 Fax: 202-626-3737 Email: pmontgomery@kslaw.com</p>

PARTY	COUNSEL OF RECORD
	Joseph Serino, Jr. Latham & Watkins LLP (NY) Email: joseph.serino@lw.com
The Goldman Sachs Group, Inc. Goldman, Sachs & Co. LLC	Rishi Nachiketa Zutshi Cleary Gottlieb Steen & Hamilton LLP (NYC) One Liberty Plaza New York, NY 10006 (212)-225-2085 Fax: (212)-225-3999 Email: rzutshi@cgsh.com Thomas J. Moloney Cleary Gottlieb Email: tmoloney@cgsh.com
HSBC Bank PLC HSBC North America Holdings Inc. HSBC Bank USA, N.A. HSBC Securities (USA) Inc.	James Matthew Goodin Locke Lord LLP 111 S Wacker Dr. Chicago, IL 60606 (312)-443-0472 Fax: (312)-896-6472 Email: jmgoodin@lockelord.com Roger Brian Cowie Locke Lord LLP 2200 Ross Avenue Suite 2200 Dallas, TX 75201 (214) 740-8614 Fax: (214)-740-8800 Email: rcowie@lockelord.com Gregory Thomas Casamento Locke Lord LLP (NYC) Email: gcasamento@lockelord.com Joseph Unis Locke Lord LLP (TX) Email: junis@lockelord.com Julia C Webb Locke Lord LLP (IL) Email: jwebb@lockelord.com
J.P. Morgan Chase & Co. J.P. Morgan Chase Bank. N.A. J.P. Morgan Securities LLC	Boris Bershteyn Skadden, Arps, Slate, Meagher & Flom LLP One Manhattan West New York, NY 10001-8602 212-735-3834 Email: boris.bershteyn@skadden.com Tibor Ludovico Nagy, Jr.

PARTY	COUNSEL OF RECORD
	<p>Dontzin Nagy & Fleissig LLP 980 Madison Avenue New York, NY 10075 (212)-717-2900 Fax: (212)-717-8088 Email: tnagy@dnflp.com</p> <p>Anuja Thatte Dontzin Nagy & Fleissig LLP Email: athatte@dnflp.com</p> <p>Gretchen Wolf Skadden, Arps, Slate, Meagher & Flom, LLP (IL) Email: gretchen.wolf@skadden.com</p> <p>Harry Peter Koulos Skadden, Arps, Slate, Meagher & Flom LLP Email: harry.koulos@skadden.com</p> <p>Jason Andrew Kolbe Dontzin Nagy & Fleissig LLP Email: jkolbe@dnflp.com</p> <p>Paul M. Kerlin Skadden, Arps, Slate, Meagher & Flom LLP (DC) Email: paul.kerlin@skadden.com</p> <p>Peter S. Julian Skadden, Arps, Slate, Meagher & Flom LLP Email: peter.julian@skadden.com</p> <p>Stephen Bryan Popernik Dontzin Nagy & Fleissig LLP Email: spopernik@dnflp.com</p> <p>Tansy Woan Skadden, Arps, Slate, Meagher & Flom LLP Email: tansy.woan@skadden.com</p>
MUFG Bank, Ltd.	<p>Andrew Corydon Finch Paul Weiss Rifkind Wharton & Garrison LLP 1285 Ave. of The Americas New York, NY 10019 (212)-373-3640</p>

PARTY	COUNSEL OF RECORD
	<p>Fax: (212)-492-0460 Email: afinch@paulweiss.com</p> <p>Kenneth Anthony Gallo Paul, Weiss, Rifkind, Wharton & Garrison LLP (NYC) Email: kgallo@paulweiss.com</p> <p>Michael E. Gertzman Paul Weiss (NY) Email: mgertzman@paulweiss.com</p> <p>Anand Sithian Paul Weiss (NY) Email: asithian@paulweiss.com</p>
<p>Morgan Stanley Morgan Stanley & Co., LLC Morgan Stanley & Co. International PLC</p>	<p>Jonathan M. Moses Wachtell, Lipton, Rosen & Katz 51 West 52nd Street New York, NY 10019 (212) 403-1000 Fax: (212) 403-2000 Email: JMMoses@wlrk.com</p> <p>Justin L. Brooke Wachtell, Lipton, Rosen & Katz Email: jlbrooke@wlrk.com</p>
<p>Natwest Markets Securities Inc. Royal Bank of Scotland PLC</p>	<p>Paul Steel Mishkin Davis Polk & Wardwell LLP (NYC) 450 Lexington Avenue New York, NY 10017 (212)-450-4292 Fax: (212)-450-3292 Email: paul.mishkin@dpw.com</p> <p>Adam Gabor Mehes Davis Polk & Wardwell LLP (NYC) Email: adam.mehes@davispolk.com</p> <p>John Michael Briggs Davis Polk & Wardwell LLP (NYC) Email: john.briggs@davispolk.com</p> <p>Maude Paquin Davis Polk & Wardwell LLP Email: maude.paquin@davispolk.com</p>

PARTY	COUNSEL OF RECORD
RBC Capital Markets LLC The Royal Bank of Canada	James P. McLoughlin, Jr. Moore & Van Allen, PLLC 100 North Tryon Street, Suite 4700 Charlotte, NC 28202 (704)-331-1054 Fax: (704)-378-2054 Email: jimmcloughlin@mvalaw.com Joshua D. Lanning Moore & Van Allen, PLLC Email: joshlanning@mvalaw.com Mark A. Nebrig Moore & Van Allen, PLLC 100 North Tryon Street, Suite 4700 Charlotte, NC 28202 (704)-331-3602 Fax: (704)-339-5974 Email: marknebrig@mvalaw.com
Société Générale S.A. SG Americas Securities, LLC	James R. Warnot, Jr. Linklaters LLP 1345 Avenue of the Americas New York, New York 10105 Telephone: (212) 903-9000 Email: james.warnot@linklaters.com Patrick C. Ashby Linklaters LLP Email: patrick.ashby@linklaters.com Nicole E. Jerry Linklaters LLP Email: nicole.e.jerry@linklaters.com Adam S. Lurie Linklaters LLP 601 13th St. NW, Suite 400 Washington, DC 20005 Telephone: (202) 654-9227 Email: adam.lurie@linklaters.com Steven Wolowitz Mayer Brown LLP 1221 Avenue of the Americas

PARTY	COUNSEL OF RECORD
	<p>New York, New York 10020-1001 Telephone: (212) 506-2500 Email: swolowitz@mayerbrown.com</p> <p>Henninger S. Bullock Mayer Brown LLP Email: hbullock@mayerbrown.com</p> <p>Andrew J. Calica Mayer Brown LLP Email: acalica@mayerbrown.com</p>
Standard Chartered Bank	<p>Lewis S. Wiener Eversheds Sutherland (US) LLP (DC) 700 Sixth St. NW, Suite 700 Washington, DC 20001 (202)-383-0100 Fax: (202)-637-3593 Email: lewiswiener@eversheds-sutherland.com</p> <p>Benjamin Andrew Fleming Hogan Lovells US LLP (NYC) 390 Madison Ave. New York, NY 10017 212 918 3283 Fax: 212 918 3100 Email: benjamin.fleming@hoganlovells.com</p> <p>Charles Barrera Moore Hogan Lovells US LLP Email: charles.moore@hoganlovells.com</p> <p>Lisa Jean Fried Hogan Lovells US LLP (NYC) Email: lisa.fried@hoganlovells.com</p> <p>Marc Joel Gottridge Hogan Lovells US LLP (NYC) Email: marc.gottridge@hoganlovells.com</p> <p>Meghana Shah Eversheds Sutherland, LLP (NYC) Email: MeghanaShah@eversheds-sutherland.us</p>

PARTY	COUNSEL OF RECORD
	<p>Ronald Walter Zdrojeski Sutherland Asbill & Brennan Email: ronzdrojeski@eversheds-sutherland.us</p> <p>Sarah Chaudhry Eversheds Sutherland, LLP (NYC) Email: sarahchaudhry@evershedssutherland.us</p>
<p>UBS AG UBS Securities LLC</p>	<p>David Jarrett Arp Gibson, Dunn & Crutcher, LLP (DC) 1025 Connecticut Avenue, N.W. Washington, DC 20036 (202)-955-8678 Fax: (202)-530-9527 Email: jarp@gibsondunn.com</p> <p>Amy Feagles Gibson, Dunn & Crutcher LLP Email: afeagles@gibsondunn.com</p> <p>Eric Jonathan Stock Gibson, Dunn & Crutcher, LLP (NY) Email: estock@gibsondunn.com</p> <p>Melanie L. Katsur Gibson, Dunn & Crutcher LLP Email: mkatsur@gibsondunn.com</p> <p>Philip Oren Shapiro Gibson, Dunn & Crutcher, LLP (NY) Email: pshapiro@gibsondunn.com</p>